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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TODD LYNN CLEAVELAND,

Defendant.

INDICTMENT

Count I: 18 U.S.C. § 922(a)(6), False
Statement During Attempted Acquisition
of Firearms.

Case: 2:22-cr-00085
Assigned To : Waddoups, Clark
Assign. Date : 3/9/2022

The Grand Jury Charges:

COUNT I

18 U.S.C. § 922(a)(6)

(False Statement During Attempted Acquisition of Firearms)

On or about February 17, 2022, in the District of Utah,

TODD LYNN CLEAVELAND,

defendant herein, in connection with the attempted acquisition of firearms, to wit: two
Savage Arms 12 gauge shotguns, from a licensed firearm dealer within the meaning of
Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written
statement intended and likely to deceive the firearm dealer with respect to any fact material
to the lawfulness of such acquisition of the firearms, in that he falsely answered "no" on

ATF form 4473 asking whether he had ever been convicted in any court of a crime punishable by imprisonment for a term of more than one year, and, as he then knew, his answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

A TRUE BILL:



FOREPERSON OF GRAND JURY

ANDREA T. MARTINEZ
United States Attorney


VICTORIA K. McFARLAND
Assistant United States Attorney